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Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC,  
and Alan Nisselson, the Chapter 7 Trustee for  
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC, and  
ALAN NISSELSO, Chapter 7 Trustee for the  
Estate of Bernard L. Madoff,

Plaintiffs,

v.

DEBORAH MADOFF, individually, and as Natural  
Guardian of A. W. M. and E. W. M.; ANDREW H.  
MADOFF, individually, and as Natural Guardian of  
A. W. M. and E. W. M.; ANDREW H. MADOFF, as  
Executor of the Estate of Mark D. Madoff, and

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05332 (SMB)

ESTATE OF MARK D. MADOFF, as Trustee of  
A. W. M. Trust U/A 11/15/93 and E. W. M. Trust  
U/A 04/01/96; A. W. M.; and E. W. M.,

Defendants.

**STIPULATION FOR VOLUNTARY DISMISSAL OF  
ACTION WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, and defendants Deborah Madoff, individually, and as Natural Guardian of A. W. M. and E.W.M.; Andrew H. Madoff, as Executor of the Estate of Mark D. Madoff, and Estate of Mark D. Madoff as Trustee of A.W.M. Trust U/A 11/15/93 and E.W.M. Trust U/A 04/01/96; A.W.M.; and E.W.M. (together the “Defendants,” and collectively with the Trustee, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree to the following:

1. On February 7, 2012, the Trustee filed and served the Amended Complaint against the Defendants in the above-captioned proceeding (the “Adversary Proceeding”). On March 23, 2012, the Defendants filed an answer to the Amended Complaint.
2. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(A)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of all of the Trustee’s claims in the Adversary Proceeding.
3. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

Dated: June 27, 2014

BAKER & HOSTETLER LLP

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Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Estate of Bernard L.  
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